



## Alabama Aviation College

A Unit of Enterprise State Community College

Feb 23, 2022

Federal Aviation Administration  
Office of Rulemaking  
Room 810  
800 Independence Avenue, SW  
Washington, DC 20591

To whom it may concern,

The Alabama Aviation College, a unit of Enterprise State Community College, air agency certificate EN4T160M, is seeking an exemption from Title 14 CFR §65.75(a), §65.77, and FAA Order 8080.6H Chapter 4 paragraph 9.a(2) Note. Specifically, we request permission for our students to take the General FAA written test after successfully passing our general level curriculum including a comprehensive exam. The Alabama Aviation College is an Aviation Maintenance Technician School (AMTS) that is approved to offer both the Airframe and Powerplant curriculum. Per FAA Order 8080.6H our students are required to complete either the Airframe or Powerplant program before allowed to take any FAA written examination including the General written exam. This procedure requires our students wait up to a full year after completing the General curriculum before completing the subsequent Airframe curriculum. If granted the exemption, students completing the General curriculum and passing the college's comprehensive General examination could take the FAA written test immediately after the subject matter is completed and while the information is current. This waiver does not apply to the Oral and Practical General Test. This change will provide the students with an opportunity to focus solely on the subject matter following in subsequent semesters in the Airframe and/or Powerplant curriculum.

Testing immediately after learning is a universally accepted instructional principle that reinforces learning, and is academically sound. The legitimacy of testing after learning is reflected in §65.80, which allows for oral and practical tests to be administered to AMTS students before they meet the applicable experience requirements of §65.77. The college requests the same consideration of academic reinforcement be extended to written tests. The Alabama Aviation College will identify students eligible to take the AMG written test after completion of the general curriculum and successfully passing a comprehensive college exam. We have procedures to notify FAA testing centers of General level curriculum graduates eligible to take the FAA written exam. Allowing AMTS students to take the FAA written test covering a body of knowledge immediately following completion of their studies of that material leads to reinforcement of academic principles, and better test passage rates. Student learning will be enhanced and reinforced by the immediate feedback provided by the testing experience. This immediate feedback, coupled with a sense of accomplishment, is expected to encourage students to continue their studies and reduce dropout rates. The student population benefits from a higher graduation rate, less economic burden from fewer instances of having to retake the tests, and the

public as a whole benefits from a stronger workforce. Previously, the FAA has acknowledged the equivalent level of safety and granted such relief to similar AMTS including this college.

Thank you in advance for your time and consideration.

Sincerely,



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